

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

DO NO HARM,

Plaintiff,

v.

WILLIAM LEE, in his official capacity as
Governor of the State of Tennessee,

Defendant.

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Case No. 3:23-cv-01175

DEFENDANT’S MOTION TO DISMISS

Defendant William Lee, in his official capacity as Governor of the State of Tennessee, respectfully requests that Plaintiff’s Complaint be dismissed pursuant to Rule 12(b)(1) of the Federal Rules of Civil Procedure. As discussed in Defendant’s separate Memorandum of Law, Plaintiff lacks standing by failing to identify (1) a particular member the challenged laws have allegedly injured, and (2) a cognizable injury to any members or to itself as an organization.

Accordingly, this Court should grant Defendant’s motion to dismiss Plaintiff’s Complaint with prejudice in its entirety.

Respectfully submitted,

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Attorney General & Reporter

/s/ Reed N. Smith

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document has been served via this Court's electronic filing system on this 8th day of January 2024.

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